

EXHIBIT C

In The Matter Of:

*Claudia Engelhorn, et al. v.
Erik D. Bolog, et al.*

Sarah K. Mayo

June 2, 2025

Video Deposition

*Beacon Court Reporting Services
100 Independence Drive, Suite 7
Hyannis, Massachusetts 02601*

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IN THE CIRCUIT COURT FOR
BALTIMORE CITY, MARYLAND

*****X
CLAUDIA ENGELHORN, ET AL.,

Plaintiffs,

v. No. C-24-CV-24-002631

ERIK D. BOLOG, ET AL.,

Defendants.

*****X

VIDEOTAPED DEPOSITION OF SARAH K. MAYO

taken at Beacon Court Reporting Services

100 Independence Drive, Suite 7

Hyannis, Massachusetts

June 3, 2025, 10:01 a.m.

Stenographic Reporter:
Janet L. Wynne, CSR No. 131793
Registered Professional Reporter
Massachusetts Notary Public

Beacon Court Reporting Services
100 Independence Drive, Suite 7
Hyannis, Massachusetts 02601
www.beaconcourtreporting.com

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APPEARANCES:

FOR THE PLAINTIFF:

Wes P. Henderson, Esq. (via remote)
Henderson Law, LLC
2127 Espey Court, Suite 204
Crofton, Maryland 21114
wph@hendersolawllc.com

FOR THE DEFENDANTS ERIK D. BOLOG; ERIK D. BOLOG,
TRUSTEE; JAREB IRREVOCABLE TRUST AGREEMENT;
SCIENCE PARK ASSOCIATES, LLC; DARNESTOWN ROAD,
INC.

Douglas Gansler, Esq.
Cadwalader, Wickersham & Taft LLP
1919 Pennsylvania Avenue NW
Washington, DC 20006
douglas.gansler@ccwt.com

FOR THE DEFENDANT WHITEFORD, TAYLOR & PRESTON LLP:

John J. Connolly, Esq.
Kirk MacKinnon Morrow, Esq. (via remote)
William J. Murphy, Esq. (via remote)
Zuckerman Spaeder LLP
100 East Pratt Street, Suite 2400
Baltimore, MD 21202-1031
jconnolly@zuckerman.com
KMackinnonMorrow@zuckerman.com
Jmurphy@zuckerman.com

Also Present:

Bob Giannini, Videographer
Budd Legal Video

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EXHIBITS

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(Original Exhibits retained by Attorney Connolly.)

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1 P R O C E E D I N G S

2 (Exhibits 1 through 5 pre-marked for
3 identification.)

4 THE VIDEOGRAPHER: Good morning. We
5 are on the record. This is the videographer
6 speaking, Bob Giannini. I'm with the court
7 reporter, Janet Wynne, with Beacon Court
8 Reporting. Today's date is June 2, 2025, and the
9 time is 10:02 a.m.

10 We are here at Beacon Court Reporting,
11 located in Hyannis, Massachusetts, to take the
12 video deposition of Sara Mayo in the matter of
13 "Claudia Engelhorn, et al., versus Erik Bolog,
14 et al."

15 Will counsel please introduce
16 themselves for the record.

17 MR. CONNOLLY: John Connolly for
18 Defendant Whiteford, Taylor & Preston LLP.

19 MR. GANSLER: Douglas Gansler for
20 Defendant Erik Bolog and other associate entities.

21 MR. HENDERSON: Wes Henderson, counsel
22 for the plaintiffs.

23 THE VIDEOGRAPHER: Okay. Thank you.

24 Will the court reporter please swear in

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1 the witness.

2 SARAH K. MAYO,
3 a witness called for examination by counsel for
4 the Defendant Whiteford, Taylor & Preston, LLP,
5 having been satisfactorily identified and duly
6 sworn by the Notary Public, deposes and says as
7 follows:

8 EXAMINATION

9 BY MR. CONNOLLY:

10 Q. Good morning, Ms. Mayo. My name is
11 John Connolly. As I mentioned, I represent a
12 defendant in this case, Whiteford, Taylor &
13 Presto. Thank you for coming here today.

14 My first question is: You are here
15 today because we sent you a subpoena; is that
16 correct?

17 A. Mm-hmm.

18 Q. All right. So I want to show you a
19 document to make sure that we're on the same page
20 as to the subpoena you received.

21 This has been pre-marked as Mayo
22 Exhibit -- Deposition Number 1. I ask you to take
23 a quick look at that and see if that's the papers
24 that you received from our office through a

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1 A. Mm-hmm.

2 MR. HENDERSON: Objection --

3 A. Yes.

4 MR. HENDERSON: -- to form and
5 substance.

6 Q. You have to answer --

7 A. Yes.

8 Q. Okay. Did she seem intoxicated?

9 MR. HENDERSON: Objection.

10 A. No.

11 Q. Did she seem like she was in pain or on
12 pain medications?

13 A. No.

14 MR. HENDERSON: Objection.

15 Q. Did she seem confused?

16 A. No.

17 MR. HENDERSON: Objection.

18 Q. Did Mr. Bolog speak to her when you
19 were in the room?

20 A. He would give her the document and
21 explain what it was. And then, before I would
22 sign it or stamp it, I just asked her if she
23 understood the documents and was signing them of
24 her own free will, because that's what I ask all

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1 the people that sign something, like, make sure
2 they're not doing it against their will.

3 Q. Okay. And that's a requirement of your
4 function as a notary; is that fair?

5 A. Yeah.

6 MR. HENDERSON: Objection.

7 Q. So you say that Mr. Bolog first
8 explained the document to her?

9 A. Yes.

10 Q. All right. Do you recall what he said?

11 A. I wasn't paying attention. I don't.

12 Q. Do you recall that Mr. Bolog passed her
13 a document and said something like, "This document
14 is a..." -- "X"?

15 A. Yes.

16 Q. All right.

17 MR. HENDERSON: Objection.

18 Q. And did she ask any questions of
19 Mr. Bolog?

20 A. No. It seemed like she trusted him.

21 Q. All right. Do you recall seeing her
22 follow along reading the document?

23 A. I don't recall.

24 Q. Okay. Were the documents presented to

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1 her right-side up or upside-down?

2 A. Right-side up.

3 Q. Okay. Did she express any confusion
4 about signing the document?

5 A. No.

6 Q. "Acknowledgment" has a specific meaning
7 for a notary public; is that correct?

8 A. Yes.

9 Q. What is that meaning?

10 A. Just acknowledging that they're signing
11 the document for its purposes and they understand
12 what it means and that I am witnessing it.

13 Q. Did you ask Ms. Engelhorn for ID?

14 A. I know her. She's personally known to
15 me; so I did not, no.

16 Q. So you don't have to ask someone for ID
17 when they're known --

18 A. Not when they're personally known to
19 me.

20 Q. And at that point she was personally
21 known to you.

22 And you said that you run through a
23 script for both Ms. Engelhorn and other people who
24 were signing documents that you are notarizing,

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1 and that script says -- you ask that the witness
2 is signing of their own freewill?

3 A. Mm-hmm.

4 MR. HENDERSON: Objection.

5 Q. What else do you ask?

6 A. That they are signing of their own
7 freewill and no one is forcing them to do so and
8 they want to sign the document.

9 Q. And you asked those questions of
10 Ms. Engelhorn with respect to Exhibit 2?

11 A. Yes.

12 Q. Why don't you take a look at Exhibit 3
13 as well.

14 A. Well, I just did a blanket one that I'm
15 here to notarize documents for you and you're
16 signing them of your own freewill.

17 Q. Okay. So you didn't run it over again?

18 A. No. Not three times, no.

19 Q. But you were satisfied that she
20 answered that she was signing the documents of her
21 own freewill?

22 A. Yes.

23 Q. And you were satisfied yourself that
24 she was not confused about the documents?

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1 date?

2 A. Yes.

3 Q. And with respect to this document, you
4 said previously you asked your normal script to
5 ensure that the signatory was signing of their own
6 freewill?

7 A. Yes.

8 Q. That applied to both Exhibit 2 and
9 Exhibit 3; is that correct?

10 A. Yes.

11 MR. HENDERSON: Objection.

12 Q. And you're -- you are -- at the time,
13 you were, in fact, satisfied that she was signing
14 of her own freewill --

15 A. Yes.

16 MR. HENDERSON: Objection.

17 Q. -- in Exhibit 3?

18 A. Mm-hmm.

19 Q. Yes?

20 A. Yes.

21 Q. Thank you.

22 Okay. Did you read Exhibit 3?

23 A. They didn't -- I was not given the
24 documents open. I was given signature pages,

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1 was not signing of his freewill?

2 A. No.

3 Q. Did he appear intoxicated or under the
4 influence of drugs?

5 A. No.

6 Q. Did he appear coerced?

7 A. No.

8 Q. Okay. Let's look at the next page of
9 that document, which is page 26. And do you see
10 that says, "Schedule A to the Foregoing
11 Irrevocable Trust"? Do you see that? It has one
12 word on it, substantively; right?

13 A. Mm-hmm.

14 Q. What's that word?

15 A. \$10 million.

16 Q. All right. And then there's a
17 signature block for that but no acknowledgment
18 form; correct?

19 A. Mm-hmm.

20 Q. And is that again, as witness,
21 Mr. Reichert on the top line?

22 A. Yes.

23 Q. And that's you on the second line?

24 A. Yes.

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1 Q. And that's Ms. Engelhorn's signature?

2 A. Correct.

3 Q. So this means that Ms. Engelhorn signed
4 this page of Exhibit 2 in your presence?

5 A. Yes.

6 Q. Now, did anybody mention the
7 \$10 million, to your recollection?

8 A. No. I never heard anything about it
9 until I got this and I read through it.

10 Q. All right. But this one, it's not a
11 hard document to read; right? -- a hard page to
12 read?

13 MR. HENDERSON: Objection.

14 A. I had no clue what it meant or what it
15 was in regards to.

16 Q. Do you remember anything about a
17 \$10 million transfer of funds --

18 A. No.

19 Q. -- from Ms. Engelhorn to Mr. Bolog?

20 A. No.

21 Q. Before or after?

22 A. No.

23 Q. So, throughout the transaction, you
24 didn't realize that, in substance, Ms. Engelhorn

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1 was giving \$10 million for the benefit of
2 Mr. Bolog?

3 MR. GANSLER: Objection.

4 MR. HENDERSON: Objection.

5 A. No.

6 Q. Okay.

7 All right. Let's put that one aside.

8 Let's put 3 aside, and let's look at Exhibit 4.

9 So do you have Exhibit 4 in front of
10 you, Ms. Mayo?

11 A. Yes.

12 Q. So this is titled "Transfer
13 Instructions," misspelled.

14 Do you see that?

15 A. Yes.

16 Q. And it's regarding "transfer of funds,"
17 also misspelled.

18 Do you see that?

19 A. Yes.

20 Q. Do you know who drafted this document?

21 A. No.

22 Q. So it also has a signature block but no
23 acknowledgment form; correct?

24 A. Yes.

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1 Q. And it says, "Signed, sealed, and
2 delivered in the presence of . . .," and there's two
3 signatures there.

4 Do you see that?

5 A. Yes.

6 Q. And is the first one Mr. Reichert?

7 A. Yes.

8 Q. And is the second one you?

9 A. Yes.

10 Q. And then that's signed by Ms. Engelhorn
11 and sealed?

12 Do you see that?

13 A. Yes.

14 Q. So does this mean that you, in fact,
15 witnessed Ms. Engelhorn's signature?

16 A. Yes.

17 Q. And now this one is dated October 12th
18 of 2021.

19 Do you see that?

20 A. Yes.

21 Q. But was it signed, in fact, at the same
22 time as Exhibits 3 and -- Exhibits 2 and 3?

23 A. Yes.

24 Q. All right. And it's not you dating it;

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1 it's someone else --

2 A. No.

3 Q. -- dating it; correct? Okay.

4 And this is also a short document. Do
5 you remember if you read it?

6 A. No.

7 Q. Were you satisfied -- although this
8 doesn't have an acknowledgment form, Ms. Engelhorn
9 signed all these documents in one sitting? Do you
10 remember that?

11 A. Yes.

12 Q. And did Mr. Bolog explain this document
13 to Ms. Engelhorn as well?

14 A. I'm not sure.

15 Q. Okay. But he generally explained
16 documents to her?

17 A. Mm-hmm. Yes.

18 MR. HENDERSON: Objection.

19 Q. I mean, you don't decide which
20 documents get acknowledged as a notary and which
21 ones just witnessed, but do you recall any
22 explanation for that?

23 A. No.

24 Q. Were there any other documents that

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1 hand the documents to Ms. Engelhorn for her
2 signature on each document?

3 A. Yes.

4 Q. And is there any reason why you -- that
5 you were aware of that he would have handed those
6 documents to her upside-down?

7 MR. HENDERSON: Objection.

8 A. Not that I was aware.

9 Q. And did you see whether the documents
10 were upside-down?

11 A. No, I did not see that.

12 Q. And had she signed those documents
13 while they were upside-down, that would have been
14 something you would have noted?

15 A. Yes.

16 MR. HENDERSON: Objection. Form and
17 substance.

18 Q. And describe that further.

19 A. It probably would have been --

20 MR. HENDERSON: Objection.

21 A. -- impossible. Her signature --

22 Q. Sorry, go ahead, start again.

23 A. It probably would have been impossible.

24 Her signature would have be a lot more crooked.

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1 Q. Okay. I am almost finished with my
2 questioning, but let me -- I'm going to ask you --
3 well, do you have any reason to believe, from your
4 personal observations, that Ms. Engelhorn was in
5 an alcohol-induced condition when she signed these
6 documents?

7 MR. HENDERSON: Objection.

8 A. No.

9 Q. I'm going to ask you this. I'm going
10 to ask you a bunch of statements and ask you if
11 they're true or not, to your personal knowledge,
12 having been there at the time these documents were
13 signed.

14 That, on or about October 11, 2021,
15 Ms. Engelhorn was vacationing in Cape Cod,
16 Massachusetts -- that she was vacationing in
17 Cape Cod, Massachusetts.

18 A. Yes.

19 Q. Is it your understanding that this was
20 a vacation home or it was her permanent residence?

21 MR. HENDERSON: Objection.

22 A. Vacation home, like, a family vacation
23 home.

24 Q. Did you in any way -- is this statement

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C E R T I F I C A T E

COMMONWEALTH OF MASSACHUSETTS

PLYMOUTH, ss.

I, Janet L. Wynne, CSR No. 131793,
Registered Professional Reporter, a Notary Public
in and for the Commonwealth of Massachusetts, do
hereby certify:

That SARAH K. MAYO, the witness whose
deposition is hereinbefore set forth, was duly
sworn by me and that such deposition is a true
record of the testimony given by said witness.

I further certify that I am not related to
any of the parties to this action by blood or
marriage and that I am in no way interested in the
outcome of this matter.

IN WITNESS WHEREOF, I have hereunto set my
hand this 3rd day of June, 2025.

/s/ Janet L. Wynne

Janet L. Wynne, Notary Public
My Commission expires:
January 31, 2031

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